

IN THE UNITED DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF ALABAMA, NORTHERN DIVISION

RECEIVED

TERRI WATSON,

Plaintiff,

v.

NUVELL FINANCIAL SERVICES, L.L.C.)  
and NUVELL NATIONAL AUTO )  
FINANCE L.L.C. d/b/a NATIONAL AUTO )  
FINANCE COMPANY, )

Defendants. )

2007 JUL 12 P 2:56

CASE NO.

2:07-CV-639-WKW

**NOTICE OF APPEARANCE**

**AND**

**MOTION FOR EXTENSION OF TIME TO FILE RESPONSIVE PLEADING**

COME NOW, G. Thomas Yearout and Paul K. Lavelle of Yearout, Spina and Lavelle, P.C. as attorneys for Nuvel Financial Services, L.L.C. and Nuvel National Auto Finance, L.L.C. d/b/a National Auto Finance Company, and file this their Notice of Appearance and hereby give notice of their representation of Nuvel Financial Services, L.L.C. and Nuvel National Auto Finance, L.L.C. d/b/a National Auto Finance Company in the above styled action.

Defendants Nuvel Financial Services, L.L.C. and Nuvel National Auto Finance, L.L.C. d/b/a National Auto Finance Company by and through its counsel of record request that they be allowed additional time to file an answer, motion to dismiss or other responsive pleading, in this action and for grounds in support thereof say as follows:

1. July 12, 2007 is the date upon which defendants first responsive pleading is due.
2. Counsel for the Defendants were first retained in this matter on or about July 9, 2007 and therefore have not had an opportunity to fully analyze and make a meaningful investigation of plaintiff's claims in order to determine the appropriate response to plaintiff's claim in accordance with their duty as officers of this Court and in Compliance with Rule 11

F.R.Civ.P.

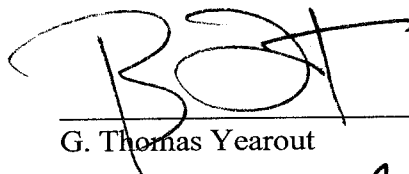
3. Counsel for the Defendants need additional time to make the proper inquiry into this action before they file a responsive pleading.

4. Counsel for the Defendants request additional time to conduct a reasonable evaluation of the claims being made by the Plaintiff and the defenses available to the Defendants in order to file an answer, motion to dismiss or other responsive pleading, in the above styled action.

5. Counsel for the Defendants request an additional 21 days to file a responsive pleading in this action.

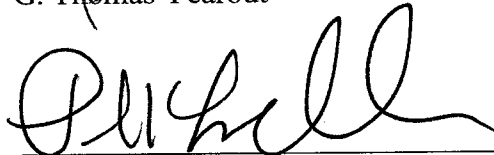
WHEREFORE, the defendants request an additional 21 days to file a responsive pleading in this action in the form of an answer, motion to dismiss or other responsive pleading and for such other, different and equitable relief to which these defendants are entitled under the premises.

Respectfully submitted,



G. Thomas Yearout

(YEA001)



Paul K. Lavelle

(LAV007)

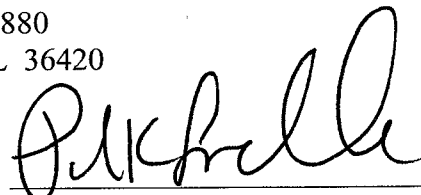
OF COUNSEL FOR DEFENDANTS  
NUVELL FINANCIAL SERVICES, L.L.C.  
AND NUVELL NATIONAL AUTO FINANCE , L.L.C d/b/a  
NATIONAL AUTO FINANCE COMPANY

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**CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of the above and foregoing upon counsel listed below by facsimile and by placing same in the United States Mail, properly addressed and postage prepaid on this the 12<sup>th</sup> day of July, 2007.

W. Harold Albritton, III  
Albrittons, Clifton, Alverson, Moody  
& Bowden, P.C.  
P.O. Box 880  
Andalusia, AL 36420

  
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OF COUNSEL